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**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF NEVADA**

In re:
 INFINITY CAPITAL MANAGEMENT, INC.
dba INFINITY HEALTH CONNECTIONS,
 Debtor.

Case No. 21-14486-abl
 Chapter 7

HASELECT-MEDICAL RECEIVABLES
 LITIGATION FINANCE FUND
 INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH–INFINITY MEDICAL
 RECEIVABLES FUND, LP,

Defendant.

Adversary Case No. 21-01167-abl

**DECLARATION OF JARED M.
 SECHRIST, ESQ. IN SUPPORT OF
 MOTION TO WITHDRAW AS
 COUNSEL FOR
 DEFENDANT/COUNTER-
 DEFENDANT TECUMSEH–INFINITY
 MEDICAL RECEIVABLE FUND, LP**

HASELECT-MEDICAL RECEIVABLES
 LITIGATION FINANCE FUND
 INTERNATIONAL SP, et al.,

Counter-Claimant,

v.

TECUMSEH–INFINITY MEDICAL
 RECEIVABLES FUND, LP, et. al.,

Counter-Defendants.

Hearing Date: May 14, 2024
 Time: 10:00 A.M.

**DECLARATION OF JARED M. SECHRIST, ESQ. IN SUPPORT OF MOTION
TO WITHDRAW AS COUNSEL FOR DEFENDANT/COUNTER-DEFENDANT
TECUMSEH-INFINITY MEDICAL RECEIVABLE FUND, LP**

I, Jared M. Sechrist, make this Declaration under 28 U.S.C. § 1746 and state as follows:

1. I am more than 21 years old, and I have never been convicted of a felony or of any crime involving moral turpitude.

2. I am fully competent to make this Declaration, and all of the facts set forth herein are based on my personal knowledge and are true and correct.

3. I am an attorney in the law firm of Garman Turner Gordon LLP ("GTG"), counsel for Defendant/Counter-defendant Tecumseh-Infinity Medical Receivable Fund, LP ("Tecumseh" and "Defendant"). I make this declaration in support of the *Motion to Withdraw as Counsel for Defendant/Counter-Defendant Tecumseh-Infinity Medical Receivable Fund, LP* [ECF No. 293] I have personal knowledge of the facts set forth herein, and if called upon to testify as to the content of this Declaration, I could and would do so.

4. On or about December 8, 2021, GTG was retained by Tecumseh in connection with above-captioned case.

5. As set forth in the retention letter agreement ("Agreement") between Defendant and GTG, the scope of GTG's employment was to provide legal counsel "... in association with Akerman LLP, Tecumseh-Infinity Medical Receivables Fund, LP, C/O Tecumseh Alternatives, LLC ("you," "your," or the "Client") in the Chapter 7 proceedings regarding Infinity Capital Management, Inc. dba Infinity Health Connections being Case No. 21-14486-abl pending before the United States Bankruptcy Court for the District of Nevada (the "Bankruptcy Case").

6. Since the conclusion of the trial, GTG's relationship with Tecumseh has deteriorated, including Tecumseh's failure to pay GTG's outstanding invoices.

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1 7. GTG's relationship with Tecumseh is no longer a functional attorney/client
2 relationship.

3 I declare under penalty of perjury of the laws of the United States of America that the
4 foregoing statements are true to the best of my knowledge and belief.

5 DATED this 9th day of April 2024.

6
7 /s/ Jared M. Sechrist
JARED M. SECHRIST

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